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Attorney for Arizona Public Service Company

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

COMMISSIONERS

DOCKETED

SEP 07 2012

GARY PIERCE, Chairman
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS

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IN THE MATTER OF ARIZONA PUBLIC
SERVICE COMPANY REQUEST FOR
APPROVAL OF UPDATED GREEN
POWER RATE SCHEDULE GPS-1, GPS-2,
AND GPS-3.

DOCKET NO. E-01345A-10-0394

MOTION FOR CONSOLIDATION

Arizona Public Service Company requests that the Commission consolidate APS's Renewable Energy Standard docket¹ with the docket concerning APS's Green Power Rate Schedules.² Consolidation is appropriate because (i) the issues in the Green Power docket are contained within and are substantially the same as the RES docket, and (ii) consolidation will not prejudice any party's rights.³

The Green Power docket involves substantially the same issues as APS's RES docket. APS's Green Power Rate Schedules are voluntary rates that permit customers to purchase electricity generated from renewable resources and is part of the RES program. Considering the RES programs necessarily requires considering the Green Power

¹ See In the Matter of the Application of Arizona Public Service Company for Approval of its 2013 Renewable Energy Standard Implementation for Reset of Renewable Energy Adjustor, Docket No. E-01345A-12-0290.

² See In the Matter of the Application of Arizona Public Service Company for Approval of Updated Green Power Rate Schedules GPS-1, GPS-2, and GPS-3, Docket No. E-01345A-10-0394.

³ See A.A.C. R14-3-109(H).

1 Program, and vice versa. The cost, revenue and budgetary overlap of APS's RES and
2 Green Power dockets render the issues in both dockets substantially the same.

3 In addition to the issues being substantially the same, consolidating APS's RES
4 and Green Power dockets will not prejudice the rights of any party. No party has
5 intervened in APS's Green Power docket and only three parties have intervened in
6 APS's RES docket. Consolidating both dockets will not inject new issues or otherwise
7 hinder the participation of these three parties in the consolidated proceeding.

8 Consolidating APS's RES and Green Power dockets is appropriate because the
9 issues in both are substantially the same and consolidation will not prejudice any party's
10 rights. Accordingly, APS requests that the Commission consolidate Dockets E-01345A-
11 10-0394 and E-01345A-12-0290.

12 RESPECTFULLY SUBMITTED this 7th day of September, 2012.

13
14 By: 
15 Thomas A. Loquvam

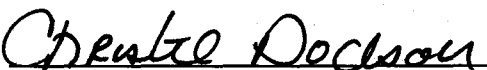
16 Attorney for Arizona Public Service Company

17 ORIGINAL and thirteen (13) copies
18 of the foregoing filed this 7th day of
September, 2012, with:

19 Docket Control
20 ARIZONA CORPORATION COMMISSION
21 1200 West Washington Street
Phoenix, Arizona 85007

22 COPY of the foregoing mailed/delivered this
7th day of September, 2012 to:

23 All Parties of Record.

24 
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